

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS LIABILITY  
LITIGATION (NO. VI)

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Civil Action No. MDL 875

This Document Relates to:

John Roland Brown and  
Brenda C. Brown, wife,

District of South Carolina,

Civil Action No. 0 : 09 - 1555

Plaintiffs,

vs.

**COMPLAINT**

A.W. Chesterton Company;  
Cleaver-Brooks, Inc., a Division of Aqua-Chem, Inc.;  
Borg-Warner Morse TEC, Inc.;  
CertainTeed Corporation;  
Fluor Daniel, Inc.;  
Fluor Daniel Services Corporation;  
General Refractories Company;  
Georgia Pacific Corporation;  
National Service Industries, Inc.;  
Rapid-American Corporation  
*(successor by merger to Glen Alden Corporation,  
Briggs Manufacturing Company, Philip Carey  
Corporation and Philip Carey Manufacturing  
Company);*  
Union Carbide Corporation;  
Viacom, Inc.  
*(successor by merger to CBS Corporation f/k/a  
Westinghouse Electric Corporation),*

Defendants,

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Plaintiffs hereby adopt and incorporate Plaintiffs' Master Long Form Complaint in Re: Asbestos Litigation in the United States District Court for the Eastern District of Pennsylvania, filed as Miscellaneous No. 86-0457. Pursuant to the October 8, 2008, Order of Honorable Eduardo C. Robreno, the following short-form Complaint is utilized in this asbestos action:

1. John Roland Brown, The Injured Plaintiff (“plaintiff-worker”) and Brenda C. Brown, (“plaintiff-worker’s spouse”). Plaintiff’s Address, Social Security Number, and Date of Birth information is available upon request.

2. The Court has jurisdiction of this matter pursuant to the Multidistrict Litigation Order dated July 29, 1991, Civil Action No. MDL 875. Moreover, the Plaintiffs are citizens of the State of South Carolina and no defendant is a citizen or has a principal place of business in the State of South Carolina. Further, the amount in controversy, exclusive of interest and costs, exceeds \$100,000.00.

3. The Defendants are those companies listed in the caption.

4. Plaintiffs hereby incorporate by reference the following counts from the Master Long-Form Complaint: Counts I, II, III, IV and V.

5. Plaintiff-worker's asbestos employment history, including, to the extent possible at this time, the asbestos products to which deceased plaintiff-worker was exposed is attached hereto as Schedule I.

6. Plaintiff-worker was diagnosed with asbestosis by David A. Schwartz, M. D. on October 14, 2006.

7. Plaintiffs certify that they have not been a party to any related third-party asbestos litigation.

8. Plaintiffs hereby demand a trial by jury on all issues of fact.

Respectfully submitted,

WALLACE AND GRAHAM, P.A.

By: s/Mona Lisa Wallace  
S.C. Bar No.: 07216  
Attorney for Plaintiff  
WALLACE & GRAHAM, P.A.  
525 North Main Street  
Salisbury, North Carolina 28144  
Tel. No. (704) 633-5244  
Fax: (704) 633-9434  
E-Mail: mwallace@wallacegraham.com

Date: 6/12/09

JOHN ROLAND BROWN  
SCHEDULE I  
Plaintiff-Worker Employment History  
Asbestos Exposure Worksite Information

OCCUPATION:

Pipe Fitter – New Schools  
Pipe Fitter – New Construction  
Pipe Fitter – Hospitals  
Pipe Fitter – Duke Energy  
Pipe- Fitter – Various  
Pipe Fitter Helper  
US Army  
Pipe Fitter Helper  
Surveyor Helper

EMPLOYER/WORKSITE:

APPROXIMATE DATES:

Action Mechanical – Rock Hill & Fort Mill, SC	2004 – Present
Alta Refrigeration – Rock Hill, SC	2003
Performance Contracting – Rock Hill, SC	2002 – 2003
Embree Reed, Inc. – Charlotte, NC	1996 – 2002
Duke Energy – most all sites	1977 – 1996
Associated Mechanical Contractors – Clark Equipment	1977
Mecon, Inc. – American Chemical-Charlotte, NC	1976
Yeargin Construction-Foote Mineral Co.-Kings Mountain, NC	1975
Gamewell Mechanical – Sandoz Chemical – Charlotte, NC	1973 – 1974
Piedmont Engineering – Bigger Bros. – Charlotte, NC	1972 – 1973
Industrial Piping, Inc. – American Chemical – Charlotte, NC	1971 – 1972
US Army – Fort Ord, CA	1969 – 1971
AME, Inc. – Fab Shop – Rock Hill, SC	1968 – 1969
Daniel Construction – Bowater Paper Mill-Catawba, SC	1968

RELATED ASBESTOS LITIGATION:

Workers Compensation Claim – Duke Energy – Settled

SMOKING HISTORY:

.5 ppd. 1/68 – 12/68 (only 1 yr.)

PRODUCTS CONTAINING ASBESTOS:

Raw Asbestos Fiber, Pipe Covering, Block, Cements, Gaskets, Refractory Materials, Boilers, Joint Compounds, Wall Board, and other asbestos containing materials.

DEPENDENTS:

Brenda C. Brown, wife

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**DEFENDANTS LIST**

Cleaver-Brooks, Inc., a Division of Aqua-Chem, Inc.  
7800 North 113th Street  
Milwaukee, WI 53224-3136

Borg-Warner Morse TEC, Inc.  
3850 Hamlin Road  
Auburn Hills, MI 48326

CertainTeed Corporation  
CT Corporation System  
225 Hillsborough Street  
Raleigh, NC 27603

A.W. Chesterton Company  
PO Box 4004  
Woburn, WA 01888-4004

Fluor Daniel, Inc.  
Corporation Service Company  
327 Hillsborough Street  
Raleigh, NC 27603

Fluor Daniel Services Corporation  
Corporation Service Company  
327 Hillsborough Street  
Raleigh, NC 27603

General Refractories Company  
225 City Avenue, Suite 114  
Bala Cynwyd, PA 19004

Georgia Pacific Corporation  
CT Corporation System  
75 Beattie Place  
Greenville, SC 29601

National Service Industries, Inc.  
Corporation Service Company  
327 Hillsborough Street  
Raleigh, NC 27603

Rapid-American Corporation  
Corporation Service Company  
2711 Centerville Road, Ste. 400  
Wilmington, DE 19808-1645

Union Carbide Corporation.  
CT Corporation System  
225 Hillsborough Street  
Raleigh, NC 27603

Viacom, Inc.  
Corporation Service Company  
2711 Centerville Road, Ste. 400  
Wilmington, DE 19808-1645